



National Pork Producers Council

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March 31, 2003

Chief, Standardization Branch
Livestock and Seed Program
Agricultural Marketing Service
U.S. Department of Agriculture
Room 2603-S, Stop 0254
1400 Independence Avenue, S.W.
Washington, DC 20250-0254

RE: Docket Number: LS-02-02; United States Standards for Livestock and Meat Marketing Claims

The National Pork Producers Council (NPPC) is pleased to submit our comments, on behalf of its members, in response to the Notice of Request for Comments on proposed United States Standards for Livestock and Meat Marketing Claims.

NPPC conducts public policy outreach on behalf of its 44 affiliated state association members, representing over 80,000 pork producers. NPPC is committed to enhancing opportunities for the success of U.S. pork producers and other industry stakeholders by establishing the U.S. pork industry as a consistent and responsible supplier of high quality pork to the domestic and world market.

NPPC appreciates the Agricultural Marketing Service's (AMS) efforts to bring uniformity to the widely varying production and marketing claims evident in the retail meat case. We agree that USDA's voluntary certification and/or audit programs should be able to verify the accuracy of the claims in the marketplace and that establishing minimum standards will help USDA/AMS meet this mission.

The AMS proposal sets out three categories of claims and standards related to the use of antibiotics (antimicrobials). NPPC has two major concerns about the proposal for antibiotic claims.

First, as producers we understand that the healthy hogs are a crucial part of maintaining a safe and wholesome food supply. NPPC believes that the safe and judicious use of antibiotics (antimicrobials) is essential for the treatment, control, and prevention disease in our herds. America's pork producers are committed to the use of scientifically based risk assessment, surveillance, and local veterinary intervention to enable our producers to safely use these products. As clearly stated in this proposal, the U.S. Food and Drug Administration (FDA) is responsible for establishing the scientifically based standard for

the withdrawal of antibiotics (antimicrobials) from food animals for a specified period prior to harvest.

We are concerned about the proposed claim entitled “ No Detectable Antibiotic Residue (Analyzed by Method X).” The proposed standard implies that somehow by extending the FDA withdrawal period by 30 days, pork products from hogs, so treated, are somehow of higher quality or safer than pork products from hogs which were raised in accordance with current FDA regulations. This is great concern to us as producers because our consumers purchase our pork products because they believe that are safe and wholesome and they have confidence in the regulatory agency that regulates the use of animal antimicrobial products. We believe that this claim should be eliminated because, while it is appropriate for AMS to verify the testing method used, the 30-day additional withdrawal period is arbitrary and undermines the rigorous and scientifically-based process for evaluating the use and labeling of these products.

Second, NPPC is concerned about the use of the claim “No Subtherapeutic Antibiotics Added.” As the term “subtherapeutic” is not a term recognized by the FDA’s Center for Veterinary Medicine in its most recent guidance document, released in October 2002; and as there is no commonly agreed upon scientific definition of the term “subtherapeutic” largely because dosages are relative as they apply to certain bacterial conditions, the term is meaningless and confusing for the consumer. Further, the word “added” when seen on a label on a package of pork in the retail meat case implies that somehow during processing antibiotics were used. This is also meaningless and confusing for the customer. We would recommend that the entire claim be eliminated, as it is both confusing and factually incorrect.

We appreciate the opportunity to present comments on behalf of America’s pork producers. If you have any additional questions, please contact Ms. Audrey Adamson, Director, Government Relations at (202) 347-3600.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jon Caspers".

Jon Caspers
President
National Pork Producers Council